



August 18, 2000

Mr. Paul Peronard  
US EPA  
EPR-SA  
999 18th St, Suite 500  
Denver, CO 80202

Mr. Paul Peronard  
US EPA  
501 Mineral Avenue  
Libby, Montana 59923

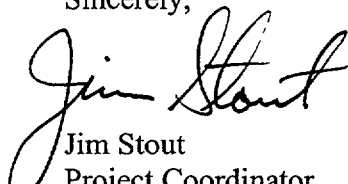
Re: **Addendum 4 to Approved Work Plan dated July 28, 2000**  
**Libby Asbestos Site (#8-BC), Libby, Lincoln County, Montana**

Dear Mr. Peronard:

Please find attached, for your review and approval, Addendum No. 4, to amend cleaning activities for the small shed.

Thank you in advance for your immediate attention with this matter. Please call if you have any questions concerning this submittal.

Sincerely,



Jim Stout  
Project Coordinator  
Libby Asbestos Site

cc: Jon Constan, Montana Department of Environmental Quality (3 copies)  
Ken Lund, Holme Roberts & Owen  
Bob Mariam, WR Grace  
David Cleary, WR Grace  
Karen Brown, WR Grace  
Matthew Cohn, US EPA

**ADDENDUM NO. 4**  
**Work Plan – Removal of Asbestos and Vermiculite**  
**at the Export Plant, Libby Asbestos Site**  
**28 July 2000**

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the sequence of performing cleaning activities for the small shed, while maintaining the safety of the public and contractor personnel.

On 16 August 2000, the EPA and WR Grace reached an agreement that cleaning of the small shed may be initiated prior to full site enclosure and movement of Millwork West retail operation, providing that it will be prepared as an isolated and restricted zone from all other parts of the property and public use and access. This enables an early start on the cleaning of the small shed in an effort to complete building cleanup before severe winter weather.

URS proposes to accomplish this in strict adherence to the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation reporting to assure the EPA that the early start in cleaning operations were performed in a manner protecting the public and allowing Millwork West to continue other site operations until relocated to the new temporary pole barn structures (Section 2.1.6 of the Work Plan) off Highway 2 scheduled for completion on 30 September 2000.

To accomplish the cleaning, URS and its subcontractors ACandS and Koch Environmental Health, Inc. (KEH) will isolate the small shed from all other site areas and activities by installing critical barriers at all openings of the small shed per the building cleanup/decontamination procedures (Appendix D, Section 3.5). The personnel decontamination unit (Appendix D, Section 2.1) will be constructed and personnel access and egress will be restricted to this one entrance. Street clothes will be doffed and donned in the clean room.

The building exterior walls will become the boundary of an isolated restricted zone in the western portion of the site (Figure 2.1). This will not restrict Millwork West's utilization of access roads or other property areas. The necessary exterior work will be accomplished as follows:

1. After 5:00 p.m. on the day(s) approved by the EPA, URS and ACandS employees, in full PPE including respirators and Tyvek<sup>®</sup>, will hand shovel and grub the small shed

foundation as needed for installation of a membrane to collect power wash overspray. The soil next to the small shed foundation will be thoroughly wet to minimize dust prior to hand digging.

2. Bagged asbestos impacted materials, including used PPE, will be removed from inside the small shed and staged in the bed of a 12-cubic yard dump truck parked on the west side of the property and covered with a tarp until approved for disposal at the mine.

In accordance with Appendix A (Sampling and Analysis Plan), KEH will implement for the small shed cleanup operations, appropriate removal area and monitoring point (i.e., clean rooms, exhaust fans, etc.) sampling activities. ACandS and KEH will also monitor personnel per the Health and Safety Plan.

Upon completion of cleaning, all critical barriers will be left in place and the negative air machines (Appendix D, Section 3.7) will be left in operation. Final clearance sampling will not be conducted (Appendix A, Section 2.3) until after exterior soils in the immediate area are removed and the EPA agrees that exterior operations should not result in recontamination with asbestos or vermiculite particles.

All materials removed will be bagged and/or contained in sealed containers per Appendix D and left on site for later removal after set-up of the full site exclusion zone. At that time per all other applicable procedures of the Work Plan, transportation for disposal would begin.

This early start on the small shed enables WR Grace to proceed rapidly with work activities, assuring completion per the revised schedule limits, not adversely affecting the Millwork West retail business, and protects the health and safety of the public, agency, or contractor personnel.

Activities initiating containment will begin as soon as possible. Complete cleaning of small shed internals is scheduled for 30 September 2000.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Signer